

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Transition from TTY to Real-Time Text)	
Technology; Petition for Rulemaking to Update the)	CG Docket No. 16-145
Commission's Rules for Access to Support the)	
Transition from TTY to Real-Time Text)	
Technology, and Petition for Waiver of the Rules)	
Requiring the Support of TTY Technology)	
)	
Petition for Waiver of Rules Requiring Support of)	GN Docket No. 15-178
TTY Technology)	
)	

Motion for Extension of Time

Pursuant to Section 1.46 of the Commission's rules,¹ Competitive Carriers Association ("CCA"), on behalf of its members Cellcom, Nex-Tech Wireless, GCI Communication Corp., Southern Communications Services, Inc. d/b/a Southern Linc, and Viaero Wireless (the "Petitioning Members"), submits this motion for a 14-day extension of time to respond to the letters dated December 21, 2020, from Suzy Rosen Singleton, Chief of the Disability Rights Office at the Federal Communications Commission ("FCC" or "Commission") to each Petitioning Member, in connection with the above-referenced matter (the "Letters").

The Letters each seek extensive and detailed information concerning the Petitioning Members' efforts to implement support for RTT for IP-based calling on wireless networks. The Letters were received by the Petitioning Members just a day or two before the Petitioning Members and their vendors closed for business or employees went out of office for the holiday season. Preparing substantive, meaningful responses to the extensive list of questions in the Letters requires both internal coordination within the Petitioning Members' company and

¹ 47 C.F.R. § 1.46.

external coordination with vendors, much of which could not even begin until late last week when companies reopened after the holiday season and/or employees returned to work.

CCA and its members appreciate the efforts of the Commission to seek out a complete picture of the progress made by Petitioning Members to deploy RTT, and the Petitioning Members would like to provide the detail and information that the FCC has requested in response to the Letters. The combination of the December holidays, the generally challenging conditions in which to collect information right now, and the upcoming federal Holidays on Monday, January 18th for the Birthday of Martin Luther King, Jr.,² and Wednesday, January 20th, for Inauguration Day³ further challenge Petitioning Members' attempts to gather sufficient information to respond in a comprehensive and timely manner. CCA respectfully proposes that an additional fourteen (14) days would enable the Petitioning Members to provide thoughtful and fulsome response to the Commissions' inquiries.

For these reasons, CCA respectfully requests that the Commission extend the Petitioning Members' time to response to the Letters for fourteen (14) days, making a response to the Letters due on February 3, 2021.⁴

Respectfully submitted,

/s/

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² 5 U.S.C. §6103(a).

³ 5 U.S.C. §6103(c).

⁴ CCA has consulted with counsel for consumer groups who have commented on the waiver petition, and counsel has represented that Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), National Association of the Deaf (NAD), and Gallaudet University Technology Access Program (TAP) do not oppose this request for extension of time.

January 14, 2021

CC (via email): Bill Wallace
Suzy Rosen Singleton
Blake Reid
Laura Moy